

III. REMARKS

Applicants have considered the current Office Action with mailing date of June 16, 2008. Claims 1-4, 7-12, 16-21 and 24-26 are pending in this application. By this amendment, claims 1, 10, and 19 have been amended, while claims 6, 15, and 23 have been canceled. Applicants are not conceding in this application that those claims are not patentable over the art cited by the Office. The present claim amendments and cancellations are only for facilitating expeditious prosecution of the allowable subject matter noted by the Office. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants respectfully reserve the right to pursue the full scope of the subject matter of these original claims and other claims in one or more subsequent patent applications that claim(s) priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1-4, 6-9, 10-12, and 15-18 are rejected under 35 U.S.C. 101, first paragraph, as allegedly lacking the necessary physical articles or objects to constitute a machine or a manufacture within the meaning of 35 U.S.C. 101. Claims 1-3, 6-12, 15-21, and 23-26 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Bakalash et al. (US Patent 6,385,604) in view of Brickell et al. (US Patent 6,385,604), and further in view of Witkowski et al. (US Patent 7,379,933), herein “Bakalash”, “Brickell”, and “Witkowski” respectively. Claim 4 is rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Bakalash in view of Brickell, in view of Witkowski, and further in view of Dias et al. (US Patent 6,317,778), hereinafter “Dias”. Applicants respectfully traverse the Office’s rejections on the followings grounds.

With regard to the Office's 35 U.S.C. 101 rejections of claims 1-4 and 6-9, Applicants have reviewed the claims and have amended claim 1 to recite, "comprising: at least one computer device." Applicants submit that the amended claim 1 contains the "necessary physical articles or objects to constitute a machine or a manufacture within the meaning of 35 U.S.C. 101." Further, Applicants have amended claim 10 to recite, "a program product stored on a computer readable storage medium." Applicants submit that the amended claim 10 more explicitly clarifies that the program product is stored on a computer readable medium, as suggested by the Office. Accordingly, Applicants respectfully request that the 35 U.S.C. 101 rejections of claims 1-4, 6-9, 10-12, and 15-18 be withdrawn.

With regard to the Office's 35 U.S.C. 103(a) rejections, Applicants assert that the Office fails to show that Bakalash in view of other sources teaches, suggests, or makes obvious each and every feature of the claimed invention. For example, with respect to amended claim 1 (and similarly claims 10 and 19), Applicants assert that the references fail to make obvious, *inter alia*, "a system for normalizing performance measures determined for summary tables that are based on different fact tables, wherein the normalizing results in a saved time per MB that is determined by the change in performance time for a summary table divided by the change in size for a summary table."

The Office cites Brickell col. 8, lines 35-44, in order to show the above subject matter. Applicants have reviewed the cited material and assert that nowhere does Brickell teach or suggest "a system for normalizing performance measures." Brickell merely discloses a Summary to Detail Reduction Factor (SDR), which is a value between 0 and 1 formed by the division of the number of rows in a new summary table by the number of rows in the summary table it

replaces. Brickell discloses an example, “a summary table that contains 250 rows of data, which is used in place of using detail tables which have 1000 rows, the reduction factor would be 250/1000 or 0.25” (Brickell col. 8, lines 37-44). Since Brickell’s SDR makes no comparison between different factors (i.e. time and space), it fails to truly normalize the performance measure and allow for comparison between summary tables. Brickell’s SDR needs additional information in order to create any form of standardization; for example, Brickell points out that the SDR must be applied to “average execution time per day” (col. 8, lines 51-52) in order to make useful estimations. Assuming, *arguendo*, that Brickell teaches a system for normalizing, Brickell still fails to teach normalizing that results in a “saved time per MB that is determined by the change in performance time for a summary table divided by the change in size for a summary table” (claim 1). Brickell’s SDR, as disclosed above, is a storage to storage comparison that results in a factor with no units. Such a factor is not equivalent to a saved timer per MB normalization, because such a factor is not formed by the division of change in performance time by change in size. However, Applicants have amended claim 1 (and similarly claims 10 and 19) in order to more explicitly clarify this point. Accordingly, Applicants respectfully request that the Office withdraw its 35 U.S.C. 103(a) rejections.

With regard to the Office’s other arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims listed above. In addition, Applicants submit that all dependant claims are allowable based on their own distinct features. However, for brevity, Applicants will forego addressing each of these rejections individually, but reserves the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejections.

IV. CONCLUSION

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

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Respectfully submitted,

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